

**IN THE UNITED STATES DISTRICT COURT  
FOR THE SOUTHERN DISTRICT OF TEXAS  
HOUSTON DIVISION**

UNITED STATES OF AMERICA

v.

EDWARD CONSTANTINESCU,  
PERRY “PJ” MATLOCK,  
JOHN RYBARCZYK,  
GARY DEEL,  
STEFAN HRVATIN,  
TOM COOPERMAN,  
MITCHELL HENNESSEY,  
DANIEL KNIGHT.

No. 4:22-CR-00612-S

**MOTION TO WITHDRAW AS COUNSEL OF RECORD**

The undersigned attorney, Jamie Hoxie Solano, Esq., respectfully submits this motion for leave to withdraw as an attorney of record on behalf of defendant Edward Constantinescu. This request is specific to the undersigned (not the firm) and is being made because the undersigned is joining a different law firm. Attorney Matthew Ford will remain lead counsel of record on behalf of Mr. Constantinescu. A proposed order granting this request is enclosed.

Dated: April 7, 2025

Respectfully submitted,

/s/ Jamie Hoxie Solano  
Jamie Hoxie Solano  
Admitted Pro Hac Vice

**CERTIFICATE OF SERVICE**

I hereby certify that on April 7, 2025, a true and correct copy of the foregoing document has been electronically served on all counsel of record via the Court's CM/ECF system.

/s/ Jamie H. Solano  
Jamie H. Solano